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Attorneys for Plaintiff

IVETTE SANCHEZ
Plaintiff

Vs.

GEICO Indemnity Company
Defendant

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Docket No.:

CIVIL ACTION

COMPLAINT

Plaintiff, Ivette Sanchez, residing at 101 Tures Avenue, Apt. 1, City of Jersey City, County of Hudson, State of New Jersey, by way of Complaint hereby says:

FIRST COUNT

1. On June 14, 2014, the Plaintiff, Ivette Sanchez, was driving his vehicle in a responsible manner when he was struck by another vehicle while traveling on Route 7 in the Township of Kearny, County of Hudson, State of New Jersey.
2. At the time to the aforementioned accident, Plaintiff was insured by GEICO Indemnity Company (hereinafter GEICO) under Policy Number: 4315-98-63-17. GEICO has its corporate headquarters located at 5260 Western Avenue, Chevy Chase, MD 20815.
3. GEICO is authorized to conduct business in the State of New Jersey and does provide automobile and other insurance to residents of the State of New Jersey.
4. Following the accident Plaintiff opened a Personal Injury Protection (PIP) claim with GEICO and sought the required medical treatments.

5. During the course of the Plaintiff's PIP claim, her personal health information was improperly disseminated by GEICO causing the Plaintiff to suffer embarrassment, shame and mental anguish.
6. At no point in time did the Plaintiff authorize the disclosure of the personal health information that was released by GEICO. The medical information released by GEICO had no bearing, relationship or relevance to the injuries sustained in the accident.
7. The unauthorized release of the Plaintiff's confidential health information was a violation of Health Insurance Portability and Accountability Act (HIPAA)

WHEREFORE, Plaintiff, Ivette Sanchez, demands judgment against the Defendant, for damages, statutory damages, punitive damages, interest, costs of suit, and any such other relief that may be deemed necessary by the Court.

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury as to all issues raised in this Complaint.

DESIGNATION OF TRIAL COUNSEL

F. R. "Chip" Dunne, III, Esq., is hereby designated as trial counsel on behalf of the plaintiff.

DUNNE, DUNNE & COHEN, LLC

F.R. "CHIP" DUNNE, III, ESQ.

CERTIFICATION

This is to certify that, to the best of our knowledge, this matter is not subject of any other action pending in any court or arbitration proceeding and none is contemplated.

DUNNE, DUNNE & COHEN, LLC

A handwritten signature in black ink, consisting of stylized, overlapping loops and curves, positioned above a horizontal line.

F.R. "CHIP" DUNNE, III, ESQ.